

**THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MICHAEL AND SHELLIE GILMOR,
et al.,

Plaintiffs,

vs.

PREFERRED CREDIT CORPORATION,
et al.,

Defendants.

Case No. 4:10-cv-00189-ODS

**JOINT MOTION FOR EXTENSION OF TIME TO FILE SUGGESTIONS IN
OPPOSITION TO MOTIONS FOR SUMMARY JUDGMENT**

The undersigned parties respectfully move the Court for an extension of time to October 12, 2012 in which to file their suggestions in opposition to the following motions for summary judgment:

- (1) Plaintiffs' Motion for Partial Summary Judgment (Doc.'s 703, 704);
- (2) Defendant Wendover Financial Services Corporation's Motion for Summary Judgment (Doc. No.'s 666 and 667);
- (3) Motion for Summary Judgment of Defendant JPMorgan Chase Bank, National Association, as Former Trustee (Doc. No.'s 675 and 676);
- (4) Defendant Litton Loan Servicing, LP's Motion for Summary Judgment (Doc. No.'s 677 and 678);
- (5) Motion for Summary Judgment of Defendant Wilmington Trust Company (Doc. No.'s 679 and 680);
- (6) Motion for Summary Judgment of Defendants LaSalle National Bank and Wells Fargo Bank, N.A. (Doc. No.'s 686 and 688).

In support of this motion, the parties jointly state as follows:

1. On August 27, 2012, Plaintiffs and various defendants filed the above summary judgment motions with suggestions in support. (Doc. No.'s 666 and 667; 675 and 676; 677 and 678; 679 and 680; 686 and 688, and 703 and 704). The motions and the suggestions for each motion are extensive.

2. The parties' respective suggestions in opposition to the above motions are due on or before September 20, 2012.

3. The undersigned parties each need additional time to prepare their suggestions in opposition given the size and number of the motions for summary judgment. In addition, the undersigned parties believe that additional time will allow them to continue exploring the possibility of one or more settlements, which would moot the need for filing any suggestions in response.

4. The undersigned parties have discussed the nature and extent of the pending motions and agree that the requested extension is appropriate.

5. This request is made in good faith, is not for purposes of delay, and will not unfairly prejudice any party. Further, the request will not adversely affect any deadlines in this case.

WHEREFORE, the undersigned parties respectfully request the Court to enter an Order granting an extension of time to October 12, 2012 in which to file their suggestions in opposition to the following motions for summary judgment:

- (1) Plaintiffs' Motion for Partial; Summary Judgment (Doc. No.'s 703, 704);
- (2) Defendant Wendover Financial Services Corporation's Motion for Summary Judgment (Doc. No.'s 666 and 667);

(3) Motion for Summary Judgment of Defendant JPMorgan Chase Bank, National Association, as Former Trustee (Doc. No.'s 675 and 676);

(4) Defendant Litton Loan Servicing, LP's Motion for Summary Judgment (Doc. No.'s 677 and 678);

(5) Motion for Summary Judgment of Defendant Wilmington Trust Company (Doc. No.'s 679 and 680);

(6) Motion for Summary Judgment of Defendants LaSalle National Bank (Doc. No.'s 686 and 688);

and to grant such other relief as the Court deems just and proper.

Dated: September 18, 2012

Respectfully submitted,

WALTERS BENDER STROHBEHN
& VAUGHAN, P.C.

By: /s/ Kip D. Richards

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**ATTORNEYS FOR DEFENDANTS BANK OF
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MERGER TO LASALLE NATIONAL BANK,
IN ITS CAPACITY AS FORMER INDENTURE
TRUSTEE OF TERMINATED TRUST IMPAC
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 18th day of September 2012, I electronically filed the above and foregoing document with the Clerk of Court of the Western District of Missouri using the Court's ECF system, which will send notification of said filing to all counsel of record who are ECF participants. In addition, a copy was served by U.S. mail, First-Class Postage Prepaid, to:

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